

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,

Plaintiff,

v.

PLAZA HOTELS, LLC, et al.,

Defendants.

Case No.: 5:25-cv-462

Judge Charles B. Goodwin

**UNOPPOSED MOTION TO STAY
BRIEFING ON DEFENDANTS
STEVE KETTER AND PLAZA
HOTELS LLC'S PENDING
MOTIONS TO DISMISS**

**UNOPPOSED MOTION TO STAY BRIEFING ON
DEFENDANTS KETTER'S AND PLAZA'S MOTIONS TO DISMISS**

Plaintiff Nancy R. ("Nancy" or "Plaintiff"), by and through her undersigned attorney, respectfully moves the Court to stay briefing on Defendant Steve Ketter's Motion to Dismiss (Doc. 97) and Defendant Plaza Hotels LLC's Motion to Dismiss (Doc. 98) until after the Court decides Plaintiff's Motion to Amend/Correct (Doc. 58).

On May 28, 2025 Plaintiff filed a Motion to Amend/Correct her complaint (Doc. 58). On July 30, 2025 Defendant Steve Ketter ("Ketter") filed a Motion to Dismiss (Doc. 97). On July 30, 2025 Defendant Plaza Hotels LLC ("Plaza") filed a Motion to Dismiss (Doc. 98). Plaintiff's responses to Ketter's and Plaza's Motions to Dismiss are currently due on August 20, 2025. Counsel for Plaintiff and counsel for Ketter and Plaza have conferred, and Defendant Ketter and Defendant Plaza do not object to the Plaintiff's request to stay briefing on the Motions to Dismiss until Plaintiff's Motion to Amend/Correct is granted or denied.

If the Court grants Plaintiff's motion for leave to amend, then the parties agree that Ketter's and Plaza's Motions to Dismiss will be automatically mooted, and Ketter and Plaza will have twenty-one (21) days to file their responsive pleadings to the Amended Complaint pursuant to the Court's Local Civil Rules.

If the Court denies the Plaintiff's Motion for Leave to Amend, Plaintiff requests that her responses to Ketter's and Plaza's pending Motions to Dismiss be due 21 days after the Court's Order.

In this way, the parties hope to conserve judicial resources by enabling Plaintiff to respond to all motions to dismiss directed to her Amended Complaint in a single omnibus brief.

Good cause exists to grant the requested stay because it will conserve both the parties' and this Court's resources. The Court should therefore stay briefing on Steve Ketter's pending Motion to Dismiss and Plaza Hotels LLC's pending motion to dismiss.

Dated: August 14, 2025

Respectfully submitted,

s/ Geoffrey C. Parker
Geoffrey C. Parker, Esq. (*Pro Hac Vice*)
Ohio Bar No. 96049
Attorney for Plaintiff
Hilton Parker LLC
7658 Slate Ridge Blvd.
Reynoldsburg, OH 43068
Telephone: (614) 992-2277
gparker@hiltonparker.com

CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2025 I filed the attached document with the Clerk of Court and served the attached document by regular mail on the following, who are not registered participants of the Electronic Case Filing System:

INDRA, LLC
c/o Ramesh Patel
15409 Kestral Lake Dr.
Edmond, OK 73013

NOOR HOTEL, LLC
c/o Abdel Jawabreh
19536 Talavera Ln.
Edmond, OK 73012

OM, LLC
c/o Ramesh Patel
15409 Kestral Lake
Edmond, OK 73013

AMBICA, LLC
c/o Ramesh Patel
15409 Kestral Lake Dr.
Edmond, OK 73013

/s/ Geoffrey C. Parker

Geoffrey C. Parker, Esq.
HILTON PARKER LLC
Attorney for Plaintiff Nancy R.